

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

KRISTINA RAPUANO, VASSIKI CHAUHAN,
SASHA BRIETZKE, ANNEMARIE BROWN,
ANDREA COURTNEY, MARISSA EVANS, and
JANE DOE,

*Plaintiffs, on behalf of themselves and all
others similarly situated,*

v.

TRUSTEES OF DARTMOUTH COLLEGE,

Defendants.

2018 NOV 15 P 1:18

CASE NO. 1:18-CV-01070

MOTION TO SEAL

EXHIBIT A: SEALED DECLARATION OF CHARLES G. DOUGLAS, III, ESQUIRE

NOW COME the Plaintiffs, by and through their attorneys, and say:

1. Plaintiff Jane Doe ("Plaintiff"), through her undersigned attorneys, makes this Motion to Seal Exhibit A: (Sealed Declaration of Charles G. Douglas, III, Esquire) to Plaintiff Jane Doe's Motion Seeking a Protective Order Sealing Portions of the Court Record. This Exhibit contains information that could be used to identify the Plaintiff Jane Doe in this case, which involves sexual misconduct and harassment perpetrated upon her. Plaintiff Jane Doe has a significant interest in maintaining her privacy and in avoiding any public association between herself and the sexual abuse, harassment, and other acts perpetrated against her. Public identification of Jane Doe would needlessly interfere with her physical and emotional well-being, and could impede her efforts to process, cope with, and recover from the conduct described in the Complaint. Plaintiff Doe is also concerned that she will suffer further retaliation

and reputational harm if she reveals her true identity, compounding the harm she has already suffered.

For the reasons discussed in Plaintiff Jane Doe's Motion Seeking a Protective Order Sealing Portions of the Court Record, this interest outweighs any countervailing public interest in revealing her identity.

2. The matter is filed under Level I and the duration is until further order of the Court.

Dated: November 15, 2018

Respectfully submitted,

/s/ Charles G. Douglas, III
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